

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :

LUZ MORALES :

:

:

Debtor(s)

:

CHAPTER 13

CASE NO. 5:15-04943

DEBTOR'S ANSWER TO TRUSTEE'S MOTION TO DISMISS

AND NOW COMES, Luz Morales, the Debtors, and files an Answer to the Trustee's

Motion to Dismiss and states the following:

1. Luz Morales, (hereinafter the "Debtors") filed a Chapter 13 bankruptcy proceeding with the U.S. Bankruptcy Court for the Middle District of Pennsylvania.

2. Charles J. DeHart, III, Esq. is the standing Chapter 13 Trustee.

3. The Trustee filed a Motion to Dismiss the Debtor's Chapter 13 case stating the Plan is non confirmable.

4. Debtor's Counsel is waiting for information from Counsel for DiTech. Said information is necessary to prepare and accurately file an amended Chapter 13 Plan.

WHEREFORE, the Debtors respectfully request that Trustee's Motion to Dismiss be denied.

Respectfully submitted,

Date: April 3, 2017 _

/s/Tullio DeLuca

Tullio DeLuca, Esquire

PA ID# 59887

381 N. 9th Street

Scranton, Pa 18504

(570) 347-7764

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on April 3, 2017, he caused a true and correct copy of Debtors' Answer to Trustee's Motion to Dismiss to be served via electronic filing in the above-referenced case, on the following:

Charles J. DeHart, III, Esq. at dehartstaff@ramapo.com

Dated: April 3, 2017

- /s/Tullio DeLuca
Tullio DeLuca, Esquire